

BOARD OF FORESTRY AND FIRE PROTECTION

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**Re: Monitoring implementation of Forest Fire Prevention Pilot Project Exemption**

PRC 4584(i)

(11)

*(F) The department **shall maintain records regarding the use of the exemption** granted in this paragraph in order to evaluate the impact of the exemption on fuel reduction and natural resources in areas where the exemption has been used.*

(G) This paragraph shall become inoperative three years after the effective date of regulations adopted by the board implementing this paragraph.

*(12) After the timber operations are complete, the department **shall conduct an onsite inspection to determine compliance** with this subdivision and whether appropriate enforcement action should be initiated.*

The Board should request the Department to conduct a field review of the Board's Pilot project Exemption. The rule is considered to be vitally important regulatory relief to assist landowners and communities with the burden of reducing hazardous fuels in the wildland-urban interface. The regulation provides expedited fuel hazard reduction of live and dead fuels by allowing timber harvesting operation under an exemption instead of a Timber Harvest Plan when operations are conducted in accordance with specific conditions.

Part of the of the adopted law, and as part of the deliberation for future consideration, is to provide follow-up review, or monitoring, on the implementation of the regulation during the effective period of the rule. The goal of the monitoring could be to determine such things as the following:

- Extent of use;
- Effectiveness in meeting fuel hazard reduction objectives;
- Effectiveness in protection of environmental resources likely effected by the operation;
- Cost effectiveness to those who used it;
- Level of regulatory compliance and compliance difficulties;

Since forest practice inspectors are required to inspect the post-harvest condition of each of the sites, the visit should include taking digital photos of before and after representative forest conditions and, at minimum, observe and record slash depth. A consistent process is recommended to avoid variation in qualitative evaluations by individual inspectors. Staff recommends a modified Browns Transect approach to measure these two parameters. The data could then be forwarded to Board staff for processing. Things that could also be considered would be to rapidly assess fuel type (1 hr, 10 hr, 100, etc) to provide additional analysis.

FUEL HAZARD REDUCTION EMERGENCY NOTICE REVIEW FORM

Project location:

Unit/EM – 65

County: _____
General site location and setting: _____
Project size
(acres): _____

Stand type and conditions:

Description of pre and post-harvest structures and stocking levels
Brief summary of stand types and conditions: _____

At least 80% of the area treated? (§ 1052.4(a)(4)). **[Yes]** **[No]**
Approximate amount of commercial products removed or planned to be removed (MBF and Biomass dry/green tons): _____

Depth of slash generated by the operation:

Depth of existing fuel bed prior to the operation:

Cost Effectiveness:

Owner’s, RPF or CDF evaluation of profitability to landowner, LTO and RFP; most significant cost components:

